

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

)	
)	
MAURA O'NEILL, as administrator of the Estate)	
of Madelyn E. Linsenmeir,)	
)	
Plaintiff,)	C.A. No. 20-30036-MGM
v.)	
)	
CITY OF SPRINGFIELD, MOISES)	
ZANAZANIAN, REMINGTON MCNABB,)	
SHEILA RODRIGUEZ, HAMPDEN COUNTY)	
SHERIFF'S DEPARTMENT, EILEEN)	
BARRETT AND MAUREEN COUTURE,)	
)	
Defendants.)	
)	
)	

**DECLARATION OF JULIUS A. HALSTEAD IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO MOTION FOR SUMMARY JUDGMENT OF THE DEFENDANTS,
HAMPDEN COUNTY SHERIFF'S DEPARTMENT, EILEEN BARRETT, AND
MAUREEN C OUTURE**

I, Julius A. Halstead, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney at the law firm of Goulston & Storrs PC, and I am counsel of record for Plaintiff Maura O'Neill, as administrator of the Estate of Madelyn E. Linsenmeir (the "Estate") in the above-captioned matter. I am licensed to practice law in the Commonwealth of Massachusetts and have been admitted before this Court. I am familiar with the facts and circumstances of this action.

2. I submit this declaration, along with the exhibits annexed hereto, in support of the Estate's Opposition to the Motion for Summary Judgment of the Defendants, Hampden County Sheriff's Department, Eileen Barrett, and Maureen Couture dated February 15, 2024.

3. Annexed hereto as **Exhibit 1** is a true and correct copy of Excerpts of Deposition Transcript of Eileen Barrett (“Barrett Dep.”) dated July 28, 2022.
4. Annexed hereto as **Exhibit 2** is a true and correct copy of Excerpts of Deposition Transcript of Maureen Couture (“Couture Dep.”) dated August 5, 2022.
5. Annexed hereto as **Exhibit 3** is a true and correct copy of Excerpts of Deposition Transcript of Sonia Piscotanno (“Piscotanno Dep.”) dated July 28, 2022.
6. Annexed hereto as **Exhibit 4** is a true and correct copy of Excerpts of Deposition Transcript of Jennifer Wisnaskas (“Wisnaskas Dep.”) dated August 5, 2022.
7. Annexed hereto as **Exhibit 5** is a true and correct copy of Excerpts of Deposition Transcript of Joan Walden (“Walden Dep.”) dated August 18, 2022.
8. Annexed hereto as **Exhibit 6** is a true and correct copy of Excerpts of Deposition Transcript of Sandi Dailey (“Dailey Dep.”) dated April 6, 2023.
9. Annexed hereto as **Exhibit 7** is a true and correct copy of Excerpts of Deposition Transcript of Samantha Ferriter (“Ferriter Dep.”) dated August 18, 2022.
10. Annexed hereto as **Exhibit 8** is a true and correct copy of Excerpts of Deposition Transcript of Gabby Villa (“Villa Dep.”) dated March 9, 2023.
11. Annexed hereto as **Exhibit 9** is a true and correct copy of Excerpts of Deposition Transcript of Alexandra Russ (“Russ Dep.”) dated August 18, 2022.
12. Annexed hereto as **Exhibit 10** is a true and correct copy of Excerpts of Deposition Transcript of Gina Phipps Walters (“Walters Dep.”) dated September 30, 2022.
13. Annexed hereto as **Exhibit 11** is a true and correct copy of Excerpts of the Deposition Transcript of Maureen Linsenmeir dated November 10, 2022 and December 16, 2022 (“M. Linsenmeir Dep.”).

14. Annexed hereto as **Exhibit 12** is a true and correct copy of the Expert Report of Dr. Simeon Kimmel (“Kimmel Rep.”).

15. Annexed hereto as **Exhibit 13** is a true and correct copy of the Expert Report of Dr. Justin Berk (“Berk Rep.”) dated November 11, 2023.

16. Annexed hereto as **Exhibit 14** is a true and correct copy of Madelyn Linsenmeir’s Western Massachusetts Regional Women’s Correctional Center Medical Records and the Jail Management System Records (“JMS”).

17. Annexed hereto as **Exhibit 15** is a true and correct copy of Declaration of Haylee Champagne (“Champagne Decl.”) dated June 16, 2023.

18. Annexed hereto as **Exhibit 16** is a true and correct copy of Declaration of Alexandria Cox (“Cox Decl.”) dated June 15, 2023.

19. Annexed hereto as **Exhibit 17** is a true and correct copy of Hamden County Jail and House of Correction’s Incident Form completed by Eileen Barrett.

20. Annexed hereto as **Exhibit 18** is a true and correct copy of Hamden County Jail and House of Correction’s redacted Patient Dispense List (“HCSD 4483”).

21. Annexed hereto as **Exhibit 19** is a true and correct copy of Hamden County Jail and House of Correction’s redacted Cell History (“HCSD 808-09”).

22. Annexed hereto as **Exhibit 20** is a true and correct copy of Hamden County Jail and House of Correction’s Incident Report completed by Karleen Neil.

23. Annexed hereto as **Exhibit 21** is a true and correct copy of Hamden County Jail and House of Correction’s Incident Report completed by Julie Belle-Isle.

24. Annexed hereto as **Exhibit 22** is a true and correct copy of Excerpts of Deposition Transcript of Julie Belle-Isle (“Belle-Isle Dep.”) dated October 21, 2022.

25. Annexed hereto as **Exhibit 23** is a true and correct copy of Hampden County Sherriff's Department and Correctional Center's Medical Record of Madelyn Linsenmeir ("HCSD 747-66").

26. Annexed hereto as **Exhibit 24** is a true and correct copy of Excerpts of Deposition Transcript of Keisha Williams ("Williams Dep.") dated January 25, 2023.

27. Annexed hereto as **Exhibit 25** is a true and correct copy of Hampden County Sherriff's Department and Correctional Center's List of Nursing Protocols concerning Withdrawals ("HCSD 5221-241").

28. Annexed hereto as **Exhibit 26** is a true and correct copy of Hampden County Sheriff's Department and Correctional Center's Wellness Assessment Check dated August 26, 2022 ("HCSD 6511-6513").

29. Annexed hereto as **Exhibit 27** is a true and correct copy of Excerpts of Deposition Transcript of Sally J. Van Wright ("Van Wright Dep.") dated January 25, 2023.

30. Annexed hereto as **Exhibit 28** is a true and correct copy of Western Massachusetts Regional Women's Correctional Center Policy and Procedure Number 4.2.11 ("HCSD 3013-20").

31. Annexed hereto as **Exhibit 29** is a true and correct copy of Hampden County Correctional Center's Nursing Protocols dated March 23, 2018 ("HCSD 5208-10").

32. Annexed hereto as **Exhibit 30** is a true and correct copy of Excerpts of Deposition Transcript of Yekaterina Alekseyeva dated October 19, 2022.

33. Annexed hereto as **Exhibit 31** are true and accurate copies of the below-named video files, which are being submitted separately on a flash drive:

- a. Video Booking Desk 1 (09.29.18)
- b. Video Booking Desk Phone Call SQD C

- c. Video Entering Medical Corridor after Booking (09.30.18)
- d. Video Entering Medical for RLU Screening (09.30.18)
- e. Video RLU Medical Screening (09.30.18)
- f. Video Post RLU Medical Screening (09.30.18)
- g. Video Exiting 1A to Medical (10.02.18)
- h. Video Walking in Corridor to Med (10.02.18)
- i. Video Going to Stairs (10.02.18)
- j. Video South Stairs to Med (10.02.18)
- k. Video Top of South Stairs (10.02.18)
- l. Video Programs (10.02.18)
- m. Video Entering Medical (10.02.18)
- n. Video Entering Medical 2 (10.02.18)
- o. Video Entering Medical 3 (10.02.18)
- p. Locked in for night to morning of 10.3.18
- q. Entering 1A Orientation Unit

34. Annexed hereto as **Exhibit 32** is a true and correct copy of Excerpts of Deposition Transcript of Rachel Reale (“Reale Dep.”) dated January 27, 2023.

35. Annexed hereto as **Exhibit 33** is a true and correct copy of Western Massachusetts Regional Women’s Correctional Center’s redacted Grievance Form from Inmate 1 (“HCSD 5107”).

36. Annexed hereto as **Exhibit 34** is a true and correct copy of Western Massachusetts Regional Women’s Correctional Center’s redacted Grievance Form from Inmate 2 (“HCSD 5173”).

37. Annexed hereto as **Exhibit 35** is a true and correct copy of Western Massachusetts Regional Women's Correctional Center's redacted Grievance Form from Inmate 3 ("HCSD 5184").

38. Annexed hereto as **Exhibit 36** is a true and correct copy of Excerpts of Deposition Transcript of Carolyn Calderigi ("Calderigi Dep.") dated January 27, 2023.

39. Annexed hereto as **Exhibit 37** is a true and correct copy of Hampden County Sheriff's Department and Correctional Center's inmate log.

40. Annexed hereto as **Exhibit 38** is a true and correct copy of Declaration of Lydia Huss dated February 14, 2024.

41. Annexed hereto as **Exhibit 39** is a true and correct copy of Rebuttal Expert Report of Dr. Simeon Kimmel ("Kimmel Reb. Rep.") dated February 15, 2024.

42. Annexed hereto as **Exhibit 40** is a true and correct copy of the Rebuttal Expert Report of Dr. Justin Berk ("Berk Reb. Rep.") dated February 15, 2024.

43. Annexed hereto as **Exhibit 41** is a true and correct copy of the Western Massachusetts Regional Women's Correctional Center's redacted Unit 1 Cell Roster from September 30, 2018 through October 4, 2018 and Cell History from September 29, 2018 through October 6, 2018 ("HCSD 803-813").

44. Annexed hereto as **Exhibit 42** is a true and correct copy of Excerpts of Deposition Transcript of Ricky Rivera ("Rivera Dep.") dated April 5, 2023.

45. Annexed hereto as **Exhibit 43** is a true and correct copy of Excerpts of Deposition Transcript of Richard Herbert ("Herbert Dep.") dated February 27, 2023.

46. Annexed hereto as **Exhibit 44** is a true and correct copy of Excerpts of Deposition Transcript of Karleen Neill ("Neill Dep.") dated October 19, 2022.

47. Annexed hereto as **Exhibit 45** is a true and correct copy of Ms. Linsenmeir's six-part-file received on February 26, 2019 per The Estate's public records request and produced in the litigations as bates numbers LINSSENMEIR00006027-8388.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, reading "Julius A. Halstead". The signature is written in a cursive style with a large, stylized initial 'J'.

Julius A. Halstead

Dated: February 15, 2024